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EIGHTH JUDICIAL DISTRICT COURT**CLARK COUNTY, NEVADA**

9 KARLISSE ALONZO, an individual,
 10
 11 Plaintiff,

Case No.: A-22-846793-C

Dept. No.: 3

v.

12 LVGV, LLC, doing business as M RESORT
 13 AND CASINO; GLP CAPITAL, LP ; THE
 14 BURKS COMPANIES, INC.; DOES 1 through
 15 100; and ROE CORPORATION 101 through
 16 200, inclusive,
 Defendant(s).

AMENDED COMPLAINT

17 COMES NOW, the Plaintiff, by and through her counsel of record, BERNSTEIN &
 18 POISSON, submits this complaint against Defendants for the foregoing causes of action, and
 19 alleges as follows:

JURISDICTION

- 21 1. Karlisse Alonzo, (hereinafter "Plaintiff") is individual residing in Clark County,
 22 Nevada.
 23 2. LVGV, LLC, is a limited liability company, doing business in Clark County,
 24 Nevada as M Resort and Casino (hereinafter "M Resort").
 25 3. GLP Capital, LP, is a limited liability company, doing business in Clark County,
 26 Nevada.
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1 4. The Burks Companies, Inc., is a corporation, doing business in Clark County,
2 Nevada.

3 5. DOE and ROE Defendants 1 through 200 are legal entities/residents of Clark
4 County, Nevada, and authorized to do business by the State of Nevada. Furthermore, said Doe
5 and Roe Defendants were employees, agents, or servants of Defendants in its control and
6 functioned and assisted in the operation, control maintenance and/or management of the premise,
7 in which plaintiff was injured, causing damages.

8 6. The true names and capacities, whether individual, corporate, associate or
9 otherwise of Defendants DOES 1 through 100 and ROE CORPORATIONS 101 through 200,
10 inclusive, are unknown to Plaintiff who therefore sues said Defendants by such fictitious names;
11 on information and belief, Plaintiff alleges that the Defendants, and each of them, designated
12 herein as a DOE or ROE CORPORATION were responsible in some manner for the injuries
13 sustained by the Plaintiff resulting from the below stated incident; and is liable for all damages
14 due to Plaintiff as alleged herein. Plaintiff will ask leave of court to amend this Complaint to
15 insert the true names and capacities when the same is ascertained and to join such Defendants in
16 this action.

17 7. DOES 1 through 5 are entities responsible for maintaining the property known as
18 M Resort, located at 12300 Las Vegas Blvd., Henderson, NV 89044. DOES 6 through 10 are
19 entities or individuals who installed or maintained the flooring subject to this incident at the
20 property known as M Resort, located at 12300 Las Vegas Blvd., Henderson, NV 89044. DOES
21 11 through 15 are the entities or individuals responsible for completing construction involved
22 with the operation of and around the asphalt subject to this incident at the property known as M
23 Resort, located at 12300 Las Vegas Blvd., Henderson, NV 89044. DOES 16 through 20 are
24 entities or individuals responsible for the maintenance and inspection of the floors subject to this
25 incident at the property at located at property known as M Resort, located at 12300 Las Vegas
26 Blvd., Henderson, NV 89044. DOES 21 through 25 are manufacturers or designers of the floor
27 and related materials required for the installation of the sidewalk which it subject to this
28 complaint. Plaintiffs will ask leave of this court to insert the true names and capacities of such

1 Defendants when the same have been ascertained. DOES 26 through 30 are contractors or
2 subcontractors hired to provide the subject device and/or install and maintain the subject floors.

3 **CLAIM FOR NEGLIGENCE**

4 8. Defendants constructed and installed the grounds that are subject to this incident,
5 property known as M Resort, located at 12300 Las Vegas Blvd., Henderson, NV 89044
6 (hereinafter “the Property”).

7 9. On July 7, 2020, Karlisse Alonzo was legally on the premise owned and operated
8 by Defendants.

9 10. While Ms. Alonzo was walking through the property she slipped and fell on a wet
10 area of the floor.

11 11. It was reasonably foreseeable that a person would walk across this area of the
12 floor.

13 12. Defendants were in charge of maintaining the common areas of the Property.

14 13. The area where Ms. Alonzo fell was in the common area.

15 14. Defendants had a duty to properly maintain the common area and provide an
16 area that was safe for use.

17 15. Defendants breached their duty by failing to maintain and provide a safe floor
18 area.

19 16. Defendants, and each of them, had a duty to supervise and maintain said premises
20 in a reasonably safe and suitable condition for its patrons, guests and invitees; and further to take
21 any and all reasonable precautions to avoid the presence of dangerous conditions on or around
22 said premises.

23 17. Defendants had a duty to inspect and maintain the common area in a safe and
24 reasonable manner to ensure safe use of the floor.

25 18. Defendants breached their duty by failing to maintain the floor and ensure its safe
26 use and operation.

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- 3 1) For General and Special Damages in a sum in excess of \$15,000.00;
- 4 2) For Attorneys' fees and costs of suit incurred herein;
- 5 3) For interest at the statutory rate; and
- 6 4) For such other and further relief as the Court may deem just and equitable in the
- 7 matter.

8 DATED: February 15, 2022.

9 Respectfully submitted,

10 **BERNSTEIN & POISSON**

11 /s/ Amber N. King
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